

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Lea Haber Kuck (LK-5556)
Four Times Square
New York, New York 10036
Tel: (212) 735-3000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, :

- against - :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
SHILIANG GUO, MERRILL LYNCH, PIERCE, :
FENNER & SMITH INC., COWEN & CO., LLC, :
and JEFFERIES & CO., INC., :

Defendants. :
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No. 07 Civ. 7895 (DAB)

**NOTICE OF MOTION
FOR ADMISSION
PRO HAC VICE OF
RYAN A. HORNING**

PLEASE TAKE NOTICE that, upon the annexed Affidavit of Ryan A.

Horning, and attachments thereto, submitted herewith, China Sunergy Co., Ltd., through the undersigned, will move this Court before the Honorable Deborah A. Batts, at the United States Courthouse, 40 Centre Street, New York, New York 10007, as soon as counsel may be heard, for an order pursuant to Rule 1.3(c) of the Rules of the United

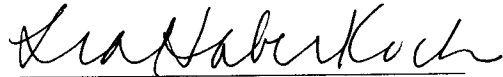
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U.S. DISTRICT COURT
S.D. OF N.Y.
2008 JAN 31 AM 11:01

640097 \$25 1-31-08 MQ

States District Court for the Southern District of New York, admitting Ryan A. Horning to practice *pro hac vice* in the above-captioned matter. For the Court's convenience, a form of Order is annexed hereto.

Dated: New York, New York
January 24, 2008

Respectfully submitted,



Lea Haber Kuck (LK-5556)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
Tel: (212) 735-3000

Attorneys for China Sunergy Co., Ltd.

Of Counsel

Frances P. Kao
Donna L. McDevitt
Ryan A. Horning
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
333 West Wacker Drive
Chicago, Illinois 60606
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, : No. 07 Civ. 7895 (DAB)

- against - : **ORDER**

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
SHILIANG GUO, MERRILL LYNCH, PIERCE, :
FENNER & SMITH INC., COWEN & CO., LLC. :
and JEFFERIES & CO., INC. :

Defendants. :

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Upon consideration of the foregoing Notice of Motion for Admission *Pro*
Hac Vice of Ryan A. Horning, and good cause having been shown,

IT IS SO ORDERED, this ____ day of January 2008, that such motion is
GRANTED.

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Lea Haber Kuck (LK-5556)
Four Times Square
New York, New York 10036
Tel: (212) 735-3000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, : No. 07 Civ. 7895 (DAB)

- against - :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
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FENNER & SMITH INC., COWEN & CO., LLC, :
and JEFFERIES & CO., INC., :

Defendants. :

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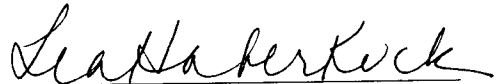
STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

Lea Haber Kuck, being duly sworn, deposes and states that:

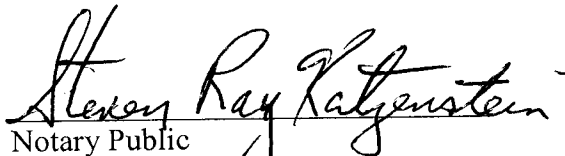
1. I am counsel in this matter for China Sunergy Co., Ltd. (“China Sunergy”). I am a member of the bar of the State of New York and admitted to practice in the United States District Court for the Southern District of New York.

2. I make this affidavit in support of the motion, pursuant to Local Rule 1.3(c), for the admission of Ryan A. Horning to practice *pro hac vice* in the above-captioned matter. I know Mr. Horning to be of the highest character and fully recommend his admission. Mr. Horning serves as counsel to China Sunergy. (See Affidavit of Ryan A. Horning, annexed hereto).

3. As shown in the Certificate of Admission annexed to his affidavit in support of his admission *pro hac vice*, Mr. Horning is a member in good standing of the bar of Illinois. He is familiar with the Federal Rules of Civil Procedure and with the Rules of the United States District Court for the Southern District of New York. (See Affidavit of Ryan A. Horning annexed hereto).


Lea Haber Kuck

Sworn to before me
this 23rd day of January 2008.


Notary Public
STEVEN RAY KATZENSTEIN
Notary Public, State of New York
No. 01KA4745340
Qualified in Queens County
Certificate Filed in New York County
Commission Expires June 30, 20 11

SKADDEN, ARPS, SLATE,
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, : No. 07 Civ. 7895 (DAB)

- against - :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
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FENNER & SMITH INC., COWEN & CO., LLC, :
and JEFFERIES & CO., INC., :

Defendants. :

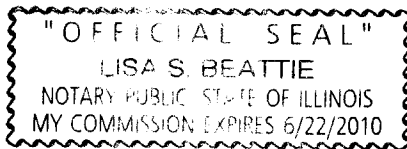
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STATE OF ILLINOIS)
)ss:
COUNTY OF COOK)

Ryan A. Horning, being duly sworn, deposes and states that:

1. I am counsel in this matter for China Sunergy Co., Ltd.
2. I make this affidavit in support of the motion for my admission to practice *pro hac vice* in the above-captioned matter.
3. I am an associate with the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Chicago, Illinois 60606, telephone number (312) 407-0700, facsimile number (312) 407-0411.

4. As shown in the Certificate of Admission annexed hereto, I am a member in good standing of the bar of Illinois. I am admitted to practice before the United States District Court for the Northern District of Illinois. I am familiar with the Federal Rules of Civil Procedure and with the Rules of the United States District Court for the Southern District of New York.




Ryan A. Horning

Sworn to before me
this 22nd day of January 2008.


Notary Public

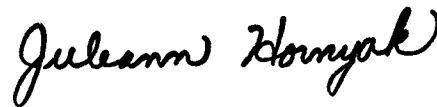
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Ryan Andrew Horning

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 2003 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Monday, January 28, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak", written in a cursive style.

Clerk

CERTIFICATE OF SERVICE

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on January 30, 2008, I caused a true copy of the

- ***Notice of Motion for Admission Pro Hac Vice of Ryan A. Horning with the annexed [Proposed] Order and Affidavit of Lea Haber Kuck in Support of Motion For Admission Pro Hac Vice sworn to on the 23rd day of January 2008 and Affidavit of Ryan A. Horning in Support of Motion for Admission Pro Hac Vice sworn to on the 22nd day of January 2008***

to be served upon the following parties by First-Class mail:

Eric J. O'Bell
Law Offices of Eric J. Bell, LLC
3500 North Hullen Street
Metairie, LA 70002


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12 East 41st Street, 12th Floor
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Suite 200
Melville, NY 11747

William Bernard Federman
Federman & Sherwood
10250 N. Pennsylvania
Oklahoma City, OK 73102

Dated: New York, New York
January 30, 2008


Steven Ray Katzenstein